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UNITED STATES DISTRICT COURT

UNDER SEAL

DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA

v.

JULIE ANN DEMILLE;
OSASUYI KENNETH IDUMWONYI;
BRANDI ELAINE ELWOOD;
JERMAINE LAMAR SCOTT;
BRANDON LA'CHON WHITE;
PRESTON BETHOVEN THOMAS;
ANN LEASHELL PRESTON;
RAWSHETTA TYNESHIA PATTERSON;
LERON LAMAR RICHARDS;
JERON LAMONT RICHARDS;
AUDREY MARIE ZIMMERMAN;
JAMES EDWARD GILL, JR.;
RENEE SMITH;
ARTHUR ALLEN HAYES, JR.;
a.k.a. "Mook"
RUBEN LEWIS, IV;
a.k.a. "Troll"
CHRYSTAL JIMELLE DAVIS;
FREDERICK LEE WASHINGTON;
MARTIN ANDREW MENEFEE; and,
JOHN EDWARD COX, JR.,

Defendants.

3:16-CR-00312-JO

INDICTMENT
18 U.S.C. § 1001(a)(2);
21 U.S.C. §§ 841(a), 841(b)(1)(C), 843(b), 846; 21 C.F.R. § 1306.04

Forfeiture Allegation(s)

UNDER SEAL

COUNT 1
(Conspiracy to Distribute or Dispense and Possess with Intent to Distribute or Dispense Controlled Substances)
(21 U.S.C. §§ 841(a)(1), (b)(1)(C), 843(b) and 846)

Introduction

1. At all times material to this Indictment, from a time unknown, but at least as early as November of 2014, and continuing up to and including July 27, 2016, in the District of Oregon and elsewhere, defendants **JULIE ANN DEMILLE** and **OSASUYI KENNETH IDUMWONYI**, and other coconspirators, whose identities are known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree with each other to distribute or dispense, and possess with intent to distribute or dispense, the Schedule II controlled substances oxycodone and hydrocodone, outside the scope of professional practice and not for a legitimate medical purpose.

2. Prior to their arrival in the District of Oregon, **JULIE ANN DEMILLE** and **OSASUYI KENNETH IDUMWONYI**, worked at three different medical clinics in the Southern District of Texas, specifically, Houston, Texas. Each of these three clinics were the subject of investigations by the Drug Enforcement Administration (hereinafter referred to as the DEA) related to unlawful prescribing practices, and the unlawful distribution and dispensation of controlled substances. All three clinics were closed as a result of these investigations and the prescribing privileges of the medical professionals running those clinics were revoked. **JULIE ANN DEMILLE** and **OSASUYI KENNETH IDUMWONYI** were not interviewed by DEA investigators during the investigation of these three clinics.

3. However, in November of 2014, following the closing of the third Houston clinic, **JULIE ANN DEMILLE** and **OSASUYI KENNETH IDUMWONYI**, worked together to establish the FUSION WELLNESS CLINIC in the District of Oregon, specifically, Portland,

Oregon. By January of 2015, **JULIE ANN DEMILLE** and **OSASUYI KENNETH IDUMWONYI** opened the FUSION WELLNESS CLINIC and began providing controlled substance prescriptions to clinic customers.

4. As part of starting the FUSION WELLNESS CLINIC, **JULIE ANN DEMILLE** established a residence in Estacada, Oregon. **OSASUYI KENNETH IDUMWONYI** maintained his residence in Spring, Texas, outside of Houston, and flew weekly from Houston to Portland, Oregon, normally arriving on Tuesday and departing on Saturday, in order to oversee the operations of the FUSION WELLNESS CLINIC.

5. To drive a steady stream of customers to the FUSION WELLNESS CLINIC, **JULIE ANN DEMILLE** and **OSASUYI KENNETH IDUMWONYI** worked together to have flyers advertising the FUSION WELLNESS CLINIC distributed throughout the neighborhoods surrounding the clinic. Similarly, **JULIE ANN DEMILLE** and **OSASUYI KENNETH IDUMWONYI** worked together to establish a website advertising FUSION WELLNESS CLINIC.

6. **JULIE ANN DEMILLE** and **OSASUYI KENNETH IDUMWONYI** operated the FUSION WELLNESS CLINIC as a cash only business and did not accept insurance payments from clinic customers. As a result, clinic customers were charged $200 per prescription, with the per prescription price later being raised to $250 per prescription.

7. At all times material to this Indictment, oxycodone and hydrocodone were Schedule II controlled substances. Both oxycodone and hydrocodone are well known to be associated with tolerance, dependence, and addiction.

8. The controlled substances oxycodone and hydrocodone, described above, were at all times material to this Indictment, to be prescribed only when medically required and were to

be taken only in a manner prescribed by a licensed prescriber for a particular patient. At all times material to this Indictment, pursuant to 21 U.S.C. § 841(a) et seq., and 21 C.F.R. § 1306.04, a prescription for a controlled substance was not legal or effective unless it was issued for a legitimate medical purpose by a practitioner acting in the usual course of professional practice.

9. At all times material to this Indictment, defendant **JULIE ANN DEMILLE** was a nurse practitioner licensed to practice and prescribe controlled substances in the State of Oregon, who maintained a practice in Portland, Oregon. **JULIE ANN DEMILLE** represented herself to be a practitioner in the area of pain care at the FUSION WELLNESS CLINIC in Portland, Oregon, a business she established with defendant **OSASUYI KENNETH IDUMWONYI**, who, among other things, acted as the office manager, collected prescription fees, and oversaw the scheduling of appointments for clinic customers. In addition to her practice at the FUSION WELLNESS CLINIC, defendant **JULIE ANN DEMILLE**, maintained a separate practice at the Clackamas County Health Clinic.

The Conspiracy

10. At all times material to this Indictment, from a time unknown, but at least as early as November of 2014, and continuing up to and including July 27, 2016, in the District of Oregon and elsewhere, defendants, **JULIE ANN DEMILLE, OSASUYI KENNETH IDUMWONYI, BRANDI ELAINE ELWOOD, JERMAINE LAMAR SCOTT, BRANDON LA'CHON WHITE, PRESTON BETHOVEN THOMAS, ANN LEASHELL PRESTON, RAWSHETTA TYNESHIA PATTERSON, LERON LAMAR RICHARDS, JERON LAMONT RICHARDS, AUDREY MARIE ZIMMERMAN, JAMES EDWARD GILL, JR., RENEE SMITH, ARTHUR ALLEN HAYES, JR., a.k.a. "Mook," RUBEN LEWIS,**

IV, a.k.a. "Troll," CHRYSTAL JIMELLE DAVIS, FREDERICK LEE WASHINGTON, MARTIN ANDREW MENEFEE, JOHN EDWARD COX, JR., and other coconspirators, whose identities are known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree with each other to distribute or dispense, and possess with intent to distribute or dispense, the Schedule II controlled substances oxycodone and hydrocodone, outside the scope of professional practice and not for a legitimate medical purpose in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), 843(b), 846 and 21 C.F.R. § 1306.04.

Objects of the Conspiracy

11. It was an object of this conspiracy to unlawfully prescribe excessive amounts of controlled substances to clinic customers in return for cash payments.

12. It was an object of this conspiracy for clinic customers to obtain controlled substances for the purpose of unlawful distribution.

Manner and Means of the Conspiracy

13. The manner and means employed by **JULIE ANN DEMILLE, OSASUYI KENNETH IDUMWONYI**, and other coconspirators, to carry out the conspiracy, and effect its unlawful objects, are set forth below:

14. In order to earn illicit profits from FUSION WELLNESS CLINIC, **OSASUYI KENNETH IDUMWONYI**, worked as an officer manager, in concert with **JULIE ANN DEMILLE**, who worked as a controlled substances prescriber.

15. As the office manager for FUSION WELLNESS CLINIC, **OSASUYI KENNETH IDUMWONYI** used his personal cellphone, and in person meetings, to conspire with individuals, hereinafter referred to as "Coconspirator Recruiters," to obtain and review the medical records of clinic customers, hereinafter referred to as "Coconspirator Customers," in an

effort to identify Coconspirator Customers who would appear to be legitimate in an effort to minimize the risk of law enforcement and regulatory detection.

16. Coconspirator Recruiters worked to identify Coconspirator Customers, and present them to the FUSION WELLNESS CLINIC, in order to gain access to controlled substance prescriptions for financial gain, and/or for the purpose of unlawfully obtaining controlled substances for illicit use and distribution.

17. Coconspirator Recruiters would often split the prescription fee Coconspirator Customers were charged by **JULIE ANN DEMILLE** and **OSASUYI KENNETH IDUMWONYI** at FUSION WELLNESS CLINIC. In return, Coconspirator Customers would pay back their Coconspirator Recruiters with a portion of the controlled substances they were prescribed. These controlled substances have an illicit street value of approximately $1 per milligram, such that one 15 milligram pill of oxycodone is worth approximately $15 dollars. Often, illicit distributors of oxycodone, for example, will slightly discount the per milligram price such that a 15 milligram pill will be sold for approximately $13. **JULIE ANN DEMILLE** would often prescribe Coconspirator Customers 120 oxycodone or hydrocodone pills at a time.

18. By splitting the prescription fee with a Coconspirator Customer, a Coconspirator Recruiter could, in some instances, receive half of a Coconspirator Customer's prescribed pills. As a result, when a Coconspirator Customer received a prescription for 120 pills of oxycodone at 15 milligrams each, from **JULIE ANN DEMILLE**, that single prescription would have a street value of approximately $1,800. As a result, by paying $100, half of the FUSION WELLNESS CLINIC prescription fee, a Coconspirator Recruiter could realize a profit of approximately $800.

19. Because each clinic customer was required by **JULIE ANN DEMILLE** and **OSASUYI KENNETH IDUMWONYI** to pay at least $200 cash for each prescription (the

prescription fee was ultimately raised to $250) the illicit profits derived by **JULIE ANN DEMILLE** and **OSASUYI KENNETH IDUMWONYI** were dependent on the volume of clinic customers receiving prescriptions.

20. Consequently, **OSASUYI KENNETH IDUMWONYI** worked directly with Coconspirator Recruiters, and Coconspirator Customers, to provide a constant stream of Coconspirator Customers into the FUSION WELLNESS CLINIC where **JULIE ANN DEMILLE** would then issue unlawful prescriptions to Coconspirator Customers, for controlled substances, outside the scope of professional practice and not for a legitimate medical purpose. This was done by both **OSASUYI KENNETH IDUMWONYI** and **JULIE ANN DEMILLE** in order to maximize the number of prescription fees that could be collected at the FUSION WELLNESS CLINIC.

21. **JULIE ANN DEMILLE** prescribed excessive amounts of controlled substances to Coconspirator Customers knowing that the Coconspirator Customers were being provided these prescriptions contrary to accepted medical practice. **JULIE ANN DEMILLE**, also prescribed controlled substances to Coconspirator Customers at the first appointment without conducting a physical examination of such individuals to verify the claimed illness or condition, or after conducting only a cursory physical examination, and, in certain cases, without reviewing drug screen tests and/or addiction histories.

22. **JULIE ANN DEMILLE** continued to unlawfully prescribe excessive amounts of controlled substances, knowing that such practice could result in overdoses, dependence, addiction, and, in some cases, death to clinic customers. In many instances, **JULIE ANN DEMILLE** repeatedly prescribed Coconspirator Customers the same excessive dosages of controlled substances regardless of their medical condition.

23. As officer manager for the FUSION WELLNESS CLINIC, **OSASUYI KENNETH IDUMWONYI**, oversaw the scheduling of clinic customer appointments, and the collection of payments from clinic customers, including payments from Coconspirator Customers, with the knowledge and understanding that **JULIE ANN DEMILLE** was prescribing controlled substances to Coconspirator Customers outside the scope of professional practice and not for a legitimate medical purpose.

24. During the course of this conspiracy, **JERMAINE LAMAR SCOTT, BRANDON LA'CHON WHITE, PRESTON BETHOVEN THOMAS, ANN LEASHELL PRESTON, RAWSHETTA TYNESHIA PATTERSON, AUDREY MARIE ZIMMERMAN, JAMES EDWARD GILL, JR., RUBEN LEWIS, IV, a.k.a. "Troll," CHRYSTAL JIMELLE DAVIS**, and, **FREDERICK LEE WASHINGTON**, and **JOHN EDWARD COX, JR.**, worked as Coconspirator Recruiters and/or Coconspirator Customers. As Coconspirator Recruiters, **JERMAINE LAMAR SCOTT, BRANDON LA'CHON WHITE, PRESTON BETHOVEN THOMAS, ANN LEASHELL PRESTON, RAWSHETTA TYNESHIA PATTERSON, AUDREY MARIE ZIMMERMAN, JAMES EDWARD GILL, JR., RUBEN LEWIS, IV, a.k.a. "Troll," CHRYSTAL JIMELLE DAVIS**, and **FREDERICK LEE WASHINGTON**, and **JOHN EDWARD COX, JR.**, would obtain medical records from prospective Coconspirator Customers and submit these records to **OSASUYI KENNETH IDUMWONYI** in order to obtain access to controlled substance prescriptions through the Coconspirator Customers, which were issued by **JULIE ANN DEMILLE**. The Coconspirator Recruiters would then obtain a portion of the Coconspirator Customers' controlled substance prescription for re-distribution to other illicit controlled substance customers. In certain instances, Coconspirator Recruiters would supply a portion of the controlled substances

they received back to **OSASUYI KENNETH IDUMWONYI** either in exchange for cash or as payment for assisting with the unlawful prescription being obtained. In other instances, Coconspirator Recruiters would illicitly re-distribute the controlled substances they received from their own prescriptions obtained at FUSION WELLNESS CLINIC from **JULIE ANN DEMILLE**.

25. During the course of this conspiracy, **LERON LAMAR RICHARDS, JERON LAMONT RICHARDS, RENEE SMITH, ARTHUR ALLEN HAYES, JR., a.k.a. "Mook,"** and **MARTIN ANDREW MENEFEE**, and other named defendants, as noted above, worked as Coconspirator Customers. As Coconspirator Customers, **LERON LAMAR RICHARDS, JERON LAMONT RICHARDS, RENEE SMITH, ARTHUR ALLEN HAYES, JR., a.k.a. "Mook,"** and **MARTIN ANDREW MENEFEE**, would submit their medical records to a Coconspirator Recruiter who would then submit the records to **OSASUYI KENNETH IDUMWONYI**, or, in other instances, they would submit their medical records directly to **OSASUYI KENNETH IDUMWONYI**. After obtaining a prescription for controlled substances from **JULIE ANN DEMILLE**, Coconspirator Customers would then distribute a portion of their controlled substance prescription back to their Coconspirator Recruiter, and in certain instances the Coconspirator Customer would then distribute a portion of their controlled substance prescription to other illicit controlled substance customers. In other instances, the Coconspirator Customers would distribute a portion of their controlled substance prescription to **OSASUYI KENNETH IDUMWONYI** and/or **BRANDI ELAINE ELWOOD**.

26. On numerous occasions during the course of this conspiracy, **BRANDI ELAINE ELWOOD** and **OSASUYI KENNETH IDUMWONYI** would communicate by cellphone to coordinate the illicit distribution of controlled substances. When **JULIE ANN DEMILLE**

would issue a prescription to a particular Coconspirator Recruiter or Coconspirator Customer, **OSASUYI KENNETH IDUMWONYI** would advise **BRANDI ELAINE ELWOOD**, by both cellphone calls and text messages, that the prescription had been issued, and then **OSASUYI KENNETH IDUMWONYI** would direct **BRANDI ELAINE ELWOOD**, by both cellphone calls and text messages, where to meet the Coconspirator Recruiter or Coconspirator Customer. **BRANDI ELAINE ELWOOD** would then travel in a coordinated manner with the Coconspirator Recruiter or Coconspirator Customer, wait until that individual filled their prescription at a pharmacy, and then obtain from that individual a portion of their controlled substance prescription. **BRANDI ELAINE ELWOOD** would then either use those controlled substances herself, or distribute them to **OSASUYI KENNETH IDUMWONYI**, or others.

27. To maximize profits from prescription fees, **OSASUYI KENNETH IDUMWONYI** would schedule such large numbers of clinic customers on any given day at FUSION WELLNESS CLINIC, such that appointments with **JULIE ANN DEMILLE** would last only a few minutes, with some appointments lasting between 45 and 90 seconds. During these appointments with **JULIE ANN DEMILLE**, the primary purpose was to provide a controlled substance prescription to the clinic customer in exchange for the prescription fee **OSASUYI KENNETH IDUMWONYI** collected immediately prior to the appointment in a separate room.

28. **JULIE ANN DEMILLE**, **OSASUYI KENNETH IDUMWONYI**, Coconspirator Recruiters, and Coconspirator Customers obtained substantial income and resources from their illegal distribution of controlled substances. From prescription fees obtained from clinic customers, **OSASUYI KENNETH IDUMWONYI** would pay **JULIE ANN DEMILLE** approximately $7,000 per week.

29. In June of 2016, **JULIE ANN DEMILLE** initiated a renewal application of her DEA registration number. As part of that application, **JULIE ANN DEMILLE** requested an exemption from the $750 DEA registrant fee on the basis that she worked only at a public health clinic, specifically the Clackamas County Health Clinic. In a recorded call with DEA, which took place on June 20, 2016, **JULIE ANN DEMILLE** was specifically asked by DEA personnel to confirm whether she worked at any other clinic besides the Clackamas County Health Clinic. Although **JULIE ANN DEMILLE** had been prescribing controlled substances from her business, the FUSION WELLNESS CLINIC, for approximately 18 months previously, and would continue to prescribe controlled substances at the FUSION WELLNESS CLINIC after June 20, 2016, **JULIE ANN DEMILLE** falsely claimed to the DEA that she worked only at the Clackamas County Health Clinic.

30. In furtherance of this conspiracy, and to effect and accomplish its objectives, the defendants, and other co-conspirators, committed one or more of the following overt acts:

OVERT ACTS

31. As listed in Counts 2-39, below.

All in violation of 21 U.S.C. § 846.

COUNT 2
(Conspiracy to Distribute or Dispense and Possess with Intent to Distribute or Dispense a Controlled Substance)
(21 U.S.C. §§ 841(a)(1), (b)(1)(C), and 846)

From a time unknown, but at least as early as January of 2015, through March 9, 2016, in the District of Oregon, and elsewhere, defendants **OSASUYI KENNETH IDUMWONYI** and **ARTHUR ALLEN HAYES, JR., a.k.a. "Mook,"** and other coconspirators, whose identities are known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree with each other to distribute or dispense, and possess with intent to distribute or dispense, the Schedule II controlled substance oxycodone, outside the scope of professional practice and not for a legitimate medical purpose, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), 846 and 21 C.F.R. § 1306.04.

COUNT 3

(Conspiracy to Distribute or Dispense and Possess with Intent to Distribute or Dispense a Controlled Substance)
(21 U.S.C. §§ 841(a)(1), (b)(1)(C), and 846)

From a time unknown, but at least as early as January of 2015, through April 1, 2016, in the District of Oregon, and elsewhere, defendants **OSASUYI KENNETH IDUMWONYI** and **RUBEN LEWIS, IV**, **a.k.a. "Troll,"** and other coconspirators, whose identities are known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree with each other to distribute or dispense, and possess with intent to distribute or dispense, the Schedule II controlled substance oxycodone, outside the scope of professional practice and not for a legitimate medical purpose, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), 846 and 21 C.F.R. § 1306.04.

COUNT 4
(Distribution or Dispensation and Possession with Intent to Distribute a Controlled Substance)
(21 U.S.C. §§ 841(a)(l), (b)(l)(C))

On or about October 9, 2015, in the District of Oregon, defendants **JULIE ANN DEMILLE**, **OSASUYI KENNETH IDUMWONYI**, and **MARTIN ANDREW MENEFEE**, did knowingly and intentionally distribute or dispense, and possess with intent to distribute or dispense, oxycodone, a Schedule II controlled substance, outside the scope of professional practice and not for a legitimate medical purpose, in violation of 21 U.S.C. §§ 841 (a)(l), 841 (b)(1)(C), and 21 C.F.R. § 1306.04.

COUNT 5
(Distribution or Dispensation and Possession with Intent to Distribute a Controlled Substance)
(21 U.S.C. §§ 841(a)(l), (b)(l)(C))

On or about December 11, 2015, in the District of Oregon, defendants **JULIE ANN DEMILLE**, **OSASUYI KENNETH IDUMWONYI**, and **MARTIN ANDREW MENEFEE**, did knowingly and intentionally distribute or dispense, and possess with intent to distribute or dispense, oxycodone, a Schedule II controlled substance, outside the scope of professional practice and not for a legitimate medical purpose, in violation of 21 U.S.C. §§ 841 (a)(l), 841 (b)(1)(C), and 21 C.F.R. § 1306.04.

COUNT 6
(Distribution and Dispensation of a Controlled Substance)
(21 U.S.C. §§ 841(a)(l), (b)(l)(C))

On or about February 11, 2016, in the District of Oregon, defendants **JULIE ANN DEMILLE**, and **OSASUYI KENNETH IDUMWONYI**, did knowingly and intentionally distribute or dispense, oxycodone, a Schedule II controlled substance, outside the scope of professional practice and not for a legitimate medical purpose, in violation of 21 U.S.C. §§ 841 (a)(l), 841 (b)(1)(C), and 21 C.F.R. § 1306.04.

COUNT 7
(Distribution or Dispensation and Possession with Intent to Distribute or Dispense a Controlled Substance)
(21 U.S.C. §§ 841(a)(l), (b)(l)(C))

On or about February 11, 2016, in the District of Oregon, defendants **JULIE ANN DEMILLE**, **OSASUYI KENNETH IDUMWONYI**, **BRANDI ELAINE ELWOOD**, and **AUDREY MARIE ZIMMERMAN**, did knowingly and intentionally distribute or dispense, and possess with intent to distribute or dispense, oxycodone, a Schedule II controlled substance, outside the scope of professional practice and not for a legitimate medical purpose, in violation of 21 U.S.C. §§ 841 (a)(l), 841 (b)(1)(C), and 21 C.F.R. § 1306.04.

COUNT 8
(Distribution or Dispensation and Possession with Intent to Distribute or Dispense a Controlled Substance)
(21 U.S.C. §§ 841(a)(l), (b)(l)(C))

On or about February 19, 2016, in the District of Oregon, defendants **JULIE ANN DEMILLE**, **OSASUYI KENNETH IDUMWONYI**, **BRANDI ELAINE ELWOOD**, and **AUDREY MARIE ZIMMERMAN**, did knowingly and intentionally distribute or dispense, and possess with intent to distribute or dispense, oxycodone, a Schedule II controlled substance, outside the scope of professional practice and not for a legitimate medical purpose, in violation of 21 U.S.C. §§ 841 (a)(l), 841 (b)(1)(C), and 21 C.F.R. § 1306.04.

COUNT 9
(Distribution or Dispensation and Possession with Intent to Distribute or Dispense a Controlled Substance)
(21 U.S.C. §§ 841(a)(l), (b)(l)(C))

On or about March 10, 2016, in the District of Oregon, defendants **JULIE ANN DEMILLE**, **OSASUYI KENNETH IDUMWONYI**, **BRANDI ELAINE ELWOOD**, and **AUDREY MARIE ZIMMERMAN**, did knowingly and intentionally distribute or dispense, and possess with intent to distribute or dispense, oxycodone, a Schedule II controlled substance, outside the scope of professional practice and not for a legitimate medical purpose, in violation of 21 U.S.C. §§ 841 (a)(l), 841 (b)(1)(C), and 21 C.F.R. § 1306.04.

COUNT 10
(Distribution or Dispensation of a Controlled Substance)
(21 U.S.C. §§ 841(a)(l), (b)(l)(C))

On or about March 10, 2016, in the District of Oregon, defendants **JULIE ANN DEMILLE**, and **OSASUYI KENNETH IDUMWONYI**, did knowingly and intentionally distribute or dispense, oxycodone, a Schedule II controlled substance, outside the scope of professional practice and not for a legitimate medical purpose, in violation of 21 U.S.C. §§ 841 (a)(l), 841 (b)(1)(C), and 21 C.F.R. § 1306.04.

COUNT 11
(Distribution or Dispensation and Possession with Intent to Distribute or Dispense a Controlled Substance)
(21 U.S.C. §§ 841(a)(l), (b)(l)(C))

On or about March 11, 2016, in the District of Oregon, defendants **JULIE ANN DEMILLE, OSASUYI KENNETH IDUMWONYI, BRANDI ELAINE ELWOOD**, and **FREDERICK LEE WASHINGTON**, did knowingly and intentionally distribute or dispense, and possess with intent to distribute or dispense, oxycodone, a Schedule II controlled substance, outside the scope of professional practice and not for a legitimate medical purpose, in violation of 21 U.S.C. §§ 841 (a)(l), 841 (b)(1)(C), and 21 C.F.R. § 1306.04.

COUNT 12
(Distribution or Dispensation and Possession with Intent to Distribute or Dispense a Controlled Substance)
(21 U.S.C. §§ 841(a)(l), (b)(l)(C))

On or about March 18, 2016, in the District of Oregon, defendants **JULIE ANN DEMILLE, OSASUYI KENNETH IDUMWONYI, BRANDI ELAINE ELWOOD**, and **AUDREY MARIE ZIMMERMAN**, did knowingly and intentionally distribute or dispense, and possess with intent to distribute or dispense, oxycodone, a Schedule II controlled substance, outside the scope of professional practice and not for a legitimate medical purpose, in violation of 21 U.S.C. §§ 841 (a)(l), 841 (b)(1)(C), and 21 C.F.R. § 1306.04.

COUNT 13
(Distribution or Dispensation and Possession with Intent to Distribute or Dispense a Controlled Substance)
(21 U.S.C. §§ 841(a)(l), (b)(l)(C))

On or about March 25, 2016, in the District of Oregon, defendants **JULIE ANN DEMILLE, OSASUYI KENNETH IDUMWONYI, BRANDI ELAINE ELWOOD**, and **JOHN EDWARD COX, JR.**, did knowingly and intentionally distribute or dispense, and possess with intent to distribute or dispense, oxycodone, a Schedule II controlled substance, outside the scope of professional practice and not for a legitimate medical purpose, in violation of 21 U.S.C. §§ 841 (a)(l), 841 (b)(1)(C), and 21 C.F.R. § 1306.04.

COUNT 14
(Distribution or Dispensation and Possession with Intent to Distribute or Dispense a Controlled Substance)
(21 U.S.C. §§ 841(a)(l), (b)(l)(C))

On or about April 8, 2016, in the District of Oregon, defendants **JULIE ANN DEMILLE, OSASUYI KENNETH IDUMWONYI, BRANDI ELAINE ELWOOD, AUDREY MARIE ZIMMERMAN**, and **JAMES EDWARD GILL, JR.**, did knowingly and intentionally distribute or dispense, and possess with intent to distribute or dispense, oxycodone, a Schedule II controlled substance, outside the scope of professional practice and not for a legitimate medical purpose, in violation of in violation of 21 U.S.C. §§ 841 (a)(l), 841 (b)(1)(C), and 21 C.F.R. § 1306.04.

COUNT 15
(Distribution or Dispensation of a Controlled Substance)
(21 U.S.C. §§ 841(a)(l), (b)(l)(C))

On or about April 14, 2016, in the District of Oregon, defendants **JULIE ANN DEMILLE**, and **OSASUYI KENNETH IDUMWONYI**, did knowingly and intentionally distribute or dispense, oxycodone, a Schedule II controlled substance, outside the scope of professional practice and not for a legitimate medical purpose, in violation of 21 U.S.C. §§ 841 (a)(l), 841 (b)(1)(C), and 21 C.F.R. § 1306.04.

COUNT 16
(Distribution or Dispensation and Possession with Intent to Distribute or Dispense a Controlled Substance)
(21 U.S.C. §§ 84l(a)(l), (b)(l)(C))

On or about May 4, 2016, in the District of Oregon, defendants **JULIE ANN DEMILLE**, **OSASUYI KENNETH IDUMWONYI**, **BRANDI ELAINE ELWOOD**, and **RENEE SMITH**, did knowingly and intentionally distribute or dispense, and possess with intent to distribute or dispense, oxycodone, a Schedule II controlled substance, outside the scope of professional practice and not for a legitimate medical purpose, in violation of 21 U.S.C. §§ 841 (a)(l), 841 (b)(1)(C), and 21 C.F.R. § 1306.04.

COUNT 17
(Conspiracy to Distribute or Dispense and Possess with Intent to Distribute or Dispense a Controlled Substance)
(21 U.S.C. §§ 841(a)(1), (b)(1)(C), 843(b) and 846)

From a time unknown, through July 27, 2016, in the District of Oregon, and elsewhere, defendants **OSASUYI KENNETH IDUMWONYI** and **BRANDI ELAINE ELWOOD**, and other coconspirators, whose identities are known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree with each other to distribute or dispense, and possess with intent to distribute or dispense, the Schedule II controlled substance oxycodone, outside the scope of professional practice and not for a legitimate medical purpose, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), 843(b), 846 and 21 C.F.R. § 1306.04.

COUNT 18
(Conspiracy to Distribute or Dispense and Possess with Intent to Distribute or Dispense a Controlled Substance)
(21 U.S.C. §§ 841(a)(1), (b)(1)(C), 843(b) and 846)

From a time unknown, but at least as early as April 8, 2016, in the District of Oregon, and elsewhere, defendants **OSASUYI KENNETH IDUMWONYI, BRANDI ELAINE ELWOOD**, **AUDREY MARIE ZIMMERMAN**, and other coconspirators, whose identities are known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree with each other to distribute or dispense, and possess with intent to distribute or dispense, the Schedule II controlled substance oxycodone, outside the scope of professional practice and not for a legitimate medical purpose, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), 843(b), 846 and 21 C.F.R. § 1306.04.

COUNT 19
(Conspiracy to Distribute or Dispense and Possess with Intent to Distribute or Dispense a Controlled Substance)
(21 U.S.C. §§ 841(a)(1), (b)(1)(C), 843(b) and 846)

From a time unknown, but at least as early as May 23, 2016, through July 6, 2016, in the District of Oregon, and elsewhere, defendants **OSASUYI KENNETH IDUMWONYI**, **BRANDI ELAINE ELWOOD**, **FREDERICK LEE WASHINGTON**, and other coconspirators, whose identities are known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree with each other to distribute or dispense, and possess with intent to distribute or dispense, the Schedule II controlled substance oxycodone, outside the scope of professional practice and not for a legitimate medical purpose, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), 843(b), 846 and 21 C.F.R. § 1306.04.

COUNT 20
(Conspiracy to Distribute or Dispense and Possess with Intent to Distribute or Dispense a Controlled Substance)
(21 U.S.C. §§ 841(a)(1), (b)(1)(C), 843(b) and 846)

From a time unknown, but at least as early as May 24, 2016, through June 15, 2016, in the District of Oregon, and elsewhere, defendants **OSASUYI KENNETH IDUMWONYI** and **PRESTON BETHOVEN THOMAS**, and other coconspirators, whose identities are known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree with each other to distribute or dispense, and possess with intent to distribute or dispense, the Schedule II controlled substance oxycodone, outside the scope of professional practice and not for a legitimate medical purpose, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), 843(b), 846 and 21 C.F.R. § 1306.04.

COUNT 21
(Conspiracy to Distribute or Dispense and Possess with Intent to Distribute or Dispense a Controlled Substance)
(21 U.S.C. §§ 841(a)(1), (b)(1)(C), 843(b) and 846)

From a time unknown, but at least as early as May 24, 2016, through July 2, 2016, in the District of Oregon, and elsewhere, defendants **OSASUYI KENNETH IDUMWONYI** and **ANN LEASHELL PRESTON**, and other coconspirators, whose identities are known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree with each other to distribute or dispense, and possess with intent to distribute or dispense, the Schedule II controlled substance oxycodone, outside the scope of professional practice and not for a legitimate medical purpose, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), 843(b), 846 and 21 C.F.R. § 1306.04.

COUNT 22
(Conspiracy to Distribute or Dispense and Possess with Intent to Distribute or Dispense a Controlled Substance)
(21 U.S.C. §§ 841(a)(1), (b)(1)(C), 843(b) and 846)

From a time unknown, but at least as early as May 25, 2016, through July 8, 2016, in the District of Oregon, and elsewhere, defendants **OSASUYI KENNETH IDUMWONYI, JAMES EDWARD GILL, JR.**, and other coconspirators, whose identities are known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree with each other to distribute or dispense, and possess with intent to distribute or dispense, the Schedule II controlled substance oxycodone, outside the scope of professional practice and not for a legitimate medical purpose, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), 843(b), 846 and 21 C.F.R. § 1306.04.

COUNT 23
(Conspiracy to Distribute or Dispense and Possess with Intent to Distribute or Dispense Controlled Substances)
(21 U.S.C. §§ 841(a)(1), (b)(1)(C), 843(b) and 846)

From a time unknown, but at least as early as May 26, 2016, through June 30, 2016, in the District of Oregon, and elsewhere, defendants **OSASUYI KENNETH IDUMWONYI, JERMAINE LAMAR SCOTT**, and other coconspirators, whose identities are known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree with each other to distribute or dispense, and possess with intent to distribute or dispense, the Schedule II controlled substances oxycodone and hydrocodone, outside the scope of professional practice and not for a legitimate medical purpose, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), 843(b), 846 and 21 C.F.R. § 1306.04.

COUNT 24
(Distribution or Dispensation and Possession with Intent to Distribute or Dispense a Controlled Substance)
(21 U.S.C. §§ 841(a)(l), (b)(l)(C))

On or about May 27, 2016, in the District of Oregon, defendants **JULIE ANN DEMILLE**, **OSASUYI KENNETH IDUMWONYI**, **BRANDI ELAINE ELWOOD**, and **ANN LEASHELL PRESTON**, did knowingly and intentionally distribute or dispense, and possess with intent to distribute or dispense, oxycodone, a Schedule II controlled substance, outside the scope of professional practice and not for a legitimate medical purpose, in violation of 21 U.S.C. §§ 841 (a)(l), 841 (b)(1)(C), and 21 C.F.R. § 1306.04

COUNT 25
(Distribution and Dispensation of a Controlled Substance)
(21 U.S.C. §§ 841(a)(l), (b)(l)(C))

On or about May 27, 2016, in the District of Oregon, defendants **JULIE ANN DEMILLE**, and **OSASUYI KENNETH IDUMWONYI**, did knowingly and intentionally distribute or dispense, oxycodone, a Schedule II controlled substance, outside the scope of professional practice and not for a legitimate medical purpose, in violation of 21 U.S.C. §§ 841 (a)(l), 841 (b)(1)(C), and 21 C.F.R. § 1306.04.

COUNT 26
(Conspiracy to Distribute or Dispense and Possess with Intent to Distribute or Dispense a Controlled Substance)
(21 U.S.C. §§ 841(a)(1), (b)(1)(C), 843(b) and 846)

From a time unknown, but at least as early as May 29, 2016, through June 15, 2016, in the District of Oregon, and elsewhere, defendants **OSASUYI KENNETH IDUMWONYI** and **CHRYSTAL JIMELLE DAVIS**, and other coconspirators, whose identities are known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree with each other to distribute or dispense, and possess with intent to distribute or dispense, the Schedule II controlled substance oxycodone, outside the scope of professional practice and not for a legitimate medical purpose, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), 843(b), 846 and 21 C.F.R. § 1306.04.

COUNT 27
(Distribution or Dispensation and Possession with Intent to Distribute or Dispense a Controlled Substance)
(21 U.S.C. §§ 841(a)(l), (b)(l)(C))

On or about June 2, 2016, in the District of Oregon, defendants **JULIE ANN DEMILLE**, **OSASUYI KENNETH IDUMWONYI**, **BRANDI ELAINE ELWOOD**, and **FREDERICK LEE WASHINGTON**, did knowingly and intentionally distribute or dispense, and possess with intent to distribute or dispense, oxycodone, a Schedule II controlled substance, outside the scope of professional practice and not for a legitimate medical purpose, in violation of 21 U.S.C. §§ 841 (a)(l), 841 (b)(1)(C), and 21 C.F.R. § 1306.04.

COUNT 28
(Distribution or Dispensation and Possession with Intent to Distribute or Dispense a Controlled Substance)
(21 U.S.C. §§ 841(a)(l), (b)(l)(C))

On or about June 2, 2016, through June 3, 2016, in the District of Oregon, defendants **JULIE ANN DEMILLE**, **OSASUYI KENNETH IDUMWONYI**, **BRANDI ELAINE ELWOOD**, and **JOHN EDWARD COX, JR.**, did knowingly and intentionally distribute or dispense, and possess with intent to distribute or dispense, oxycodone, a Schedule II controlled substance, outside the scope of professional practice and not for a legitimate medical purpose, in violation of 21 U.S.C. §§ 841 (a)(l), 841 (b)(1)(C), and 21 C.F.R. § 1306.04.

COUNT 29
(Conspiracy to Distribute or Dispense and Possess with Intent to Distribute or Dispense Controlled Substances)
(21 U.S.C. §§ 841(a)(1), (b)(1)(C), 843(b) and 846)

From a time unknown, but at least as early as June 2, 2016, through June 17, 2016, in the District of Oregon, and elsewhere, defendants **OSASUYI KENNETH IDUMWONYI, BRANDI ELAINE ELWOOD, JOHN EDWARD COX, JR.**, and other coconspirators, whose identities are known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree with each other to distribute or dispense, and possess with intent to distribute or dispense, the Schedule II controlled substances oxycodone and hydrocodone, outside the scope of professional practice and not for a legitimate medical purpose, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), 843(b), 846 and 21 C.F.R. § 1306.04.

COUNT 30
(Distribution or Dispensation and Possession with Intent to Distribute or Dispense a Controlled Substance)
(21 U.S.C. §§ 841(a)(l), (b)(l)(C))

On or about June 10, 2016, in the District of Oregon, defendants **JULIE ANN DEMILLE, OSASUYI KENNETH IDUMWONYI, BRANDI ELAINE ELWOOD**, and **BRANDON LA'CHON WHITE**, did knowingly and intentionally distribute or dispense, and possess with intent to distribute or dispense, oxycodone, a Schedule II controlled substance, outside the scope of professional practice and not for a legitimate medical purpose, in violation of 21 U.S.C. §§ 841 (a)(l), 841 (b)(1)(C), and 21 C.F.R. § 1306.04.

COUNT 31
(Conspiracy to Distribute or Dispense and Possess with Intent to Distribute or Dispense Controlled Substances)
(21 U.S.C. §§ 841(a)(1), (b)(1)(C), 843(b) and 846)

From a time unknown, but at least as early as June 10, 2016, through July 3, 2016, in the District of Oregon, and elsewhere, defendants **OSASUYI KENNETH IDUMWONYI** and

BRANDON LA'CHON WHITE, and other coconspirators, whose identities are known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree with each other to distribute or dispense, and possess with intent to distribute or dispense, the Schedule II controlled substances oxycodone and hydrocodone, outside the scope of professional practice and not for a legitimate medical purpose, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), 843(b), 846 and 21 C.F.R. § 1306.04.

COUNT 32
(Conspiracy to Distribute or Dispense and Possess with Intent to Distribute or Dispense a Controlled Substance)
(21 U.S.C. §§ 841(a)(1), (b)(1)(C), 843(b) and 846)

From a time unknown, but at least as early as June 10, 2016, through July 7, 2016, in the District of Oregon, and elsewhere, defendants **OSASUYI KENNETH IDUMWONYI, RAWSHETTA TYNESHIA PATTERSON, LERON LAMAR RICHARDS**, and **JERON LAMONT RICHARDS**, and other coconspirators, whose identities are known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree with each other to distribute or dispense, and possess with intent to distribute or dispense, the Schedule II controlled substance oxycodone, outside the scope of professional practice and not for a legitimate medical purpose, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), 843(b), 846 and 21 C.F.R. § 1306.04.

COUNT 33
(Distribution or Dispensation and Possession with Intent to Distribute or Dispense a Controlled Substance)
(21 U.S.C. §§ 84l(a)(l), (b)(l)(C))

On or about June 17, 2016, in the District of Oregon, defendants **JULIE ANN DEMILLE, OSASUYI KENNETH IDUMWONYI, BRANDI ELAINE ELWOOD**, and **JOHN EDWARD COX, JR.**, did knowingly and intentionally distribute or dispense, and possess with intent to distribute or dispense, oxycodone, a Schedule II controlled substance, outside the scope of professional practice and not for a legitimate medical purpose, in violation of 21 U.S.C. §§ 841 (a)(l), 841 (b)(1)(C), and 21 C.F.R. § 1306.04.

COUNT 34
(False Statement or Representation Made to a Department or Agency of the United States)
(18 U.S.C. § 1001(a)(2))

On or about June 20, 2016, in the District of Oregon, defendant **JULIE ANN DEMILLE**, did knowingly and willfully make a materially false, fictitious, or fraudulent statement or representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by stating in a recorded call to a representative of the Drug Enforcement Administration that she was eligible for a registrant fee exemption because she was working solely as a prescriber at the Clackamas County Health Clinic. This statement or representation was false because, as defendant **JULIE ANN DEMILLE** then and there knew, she was also working as a prescriber at the Fusion Wellness Clinic, in Portland, Oregon, had been doing so for approximately eighteen months previously, and intended to continue prescribing at the FUSION WELLNESS CLINIC when the statement was made, thereby making her ineligible for the requested registrant fee exemption, all in violation of 18 U.S.C. §1001(a)(2).

COUNT 35
(Distribution and Dispensation of a Controlled Substance)
(21 U.S.C. §§ 84l(a)(l), (b)(l)(C))

On or about June 30, 2016, in the District of Oregon, defendants **JULIE ANN DEMILLE**, and **OSASUYI KENNETH IDUMWONYI**, did knowingly and intentionally distribute or dispense, oxycodone, a Schedule II controlled substance, outside the scope of professional practice and not for a legitimate medical purpose, in violation of 21 U.S.C. §§ 841 (a)(l), 841 (b)(1)(C), and 21 C.F.R. § 1306.04.

COUNT 36
(Distribution or Dispensation and Possession with Intent to Distribute or Dispense a Controlled Substance)
(21 U.S.C. §§ 841(a)(l), (b)(l)(C))

On or about June 30, 2016, in the District of Oregon, defendants **JULIE ANN DEMILLE**, **OSASUYI KENNETH IDUMWONYI**, **BRANDI ELAINE ELWOOD**, and **RENEE SMITH**, did knowingly and intentionally distribute or dispense, and possess with intent to distribute or dispense, oxycodone, a Schedule II controlled substance, outside the scope of professional practice and not for a legitimate medical purpose, in violation of 21 U.S.C. §§ 841 (a)(l), 841 (b)(1)(C), and 21 C.F.R. § 1306.04.

COUNT 37
(Distribution or Dispensation and Possession with Intent to Distribute or Dispense a Controlled Substance)
(21 U.S.C. §§ 841(a)(l), (b)(l)(C))

On or about July 6, 2016, in the District of Oregon, defendants **JULIE ANN DEMILLE**, **OSASUYI KENNETH IDUMWONYI**, and **FREDERICK LEE WASHINGTON**, did knowingly and intentionally distribute or dispense, and possess with intent to distribute or dispense, oxycodone, a Schedule II controlled substance, outside the scope of professional practice and not for a legitimate medical purpose, in violation of 21 U.S.C. §§ 841 (a)(l), 841 (b)(1)(C), and 21 C.F.R. § 1306.04.

COUNT 38
(Distribution and Dispensation of a Controlled Substance)
(21 U.S.C. §§ 841(a)(l), (b)(l)(C))

On or about July 7, 2016, in the District of Oregon, defendants **JULIE ANN DEMILLE**, **OSASUYI KENNETH IDUMWONYI**, **RAWSHETTA TYNESHIA PATTERSON**,

LERON LAMAR RICHARDS, and **JERON LAMONT RICHARDS**, did knowingly and intentionally distribute or dispense, and possess with intent to distribute or dispense, oxycodone, a Schedule II controlled substance, outside the scope of professional practice and not for a legitimate medical purpose, in violation of 21 U.S.C. §§ 841 (a)(l), 841 (b)(1)(C), and 21 C.F.R. § 1306.04.

COUNT 39
(False Statement or Representation Made to a Department or Agency of the United States)
(18 U.S.C. § 1001(a)(2))

On or about July 19, 2016, in the District of Oregon, defendant **JULIE ANN DEMILLE**, did knowingly and willfully make a materially false, fictitious, or fraudulent statement or representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by stating in a recorded call, to a Special Agent of the Drug Enforcement Administration, that she was seeking a new DEA registration number due to the fact that she was considering beginning part-time work as a prescriber at a practice, that was not a public health clinic, requiring her to pay a DEA registrant fee. This statement or representation was false because, as defendant **JULIE ANN DEMILLE** then and there knew, she was presently working as a prescriber at the Fusion Wellness Clinic, in Portland, Oregon, and had been doing so for approximately eighteen months previously, and intended to continue prescribing at the FUSION WELLNESS CLINIC when the statement was made, all in violation of 18 U.S.C. §1001(a)(2).

Criminal Forfeiture

DRUG CONSPIRACY FORFEITURE ALLEGATION

Upon conviction of the drug conspiracies alleged in Counts 1-3, 17-23, 26, 29 and 31-32, of this Indictment, **JULIE ANN DEMILLE, OSASUYI KENNETH IDUMWONYI,**

BRANDI ELAINE ELWOOD, **JERMAINE LAMAR SCOTT**, **BRANDON LA'CHON WHITE**, **PRESTON BETHOVEN THOMAS**, **ANN LEASHELL PRESTON**, **RAWSHETTA TYNESHIA PATTERSON**, **LERON LAMAR RICHARDS**, **JERON LAMONT RICHARDS**, **AUDREY MARIE ZIMMERMAN**, **JAMES EDWARD GILL, JR.**, **RENEE SMITH**, **ARTHUR ALLEN HAYES, JR., a.k.a. "Mook," RUBEN LEWIS, IV**, **a.k.a. "Troll," CHRYSTAL JIMELLE DAVIS**, **FREDERICK LEE WASHINGTON**, **MARTIN ANDREW MENEFEE**, and **JOHN EDWARD COX, JR.**, defendants herein, shall forfeit to the United States pursuant to 21 U.S.C. § 853 and 970, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the said violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations.

A money judgment for a sum of money equal to the amount of property representing the amount of proceeds obtained as a result of the conspiracy alleged in Count 1, for which the defendants are jointly and severally liable.

If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) as incorporated by 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendant(s) up to the value of the forfeitable property described above.

Dated this 20 day of July 2016.

A TRUE BILL.

OFFICIATING FOREPERSON

Presented by:

BILLY J. WILLIAMS
United States Attorney

PATRICK J. EHLERS, OSB # 041186
Assistant United States Attorney